



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

BQ-2

John Camp, Treasurer
South Carolina Republican Party
P.O. Box 21765
Columbia, SC 29221

JUN 15 1994

Identification Number: C00034033

Reference: April Quarterly Report (1/1/94-3/31/94)

Dear Mr. Camp:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your committee has filed a Schedule H1 which indicates that your federal allocation ratio for administrative and generic voter drive costs is 14%. However, you have failed to allocate expenses between your federal and non-federal accounts. Please clarify this discrepancy.

-Please confirm that the amount listed on Line 21(b) represents a 100% payment, from the federal account, of the total cost of each individual expenditure.

-Your report discloses a payment on Schedule D to South Carolina Republican Party-Non Federal Account, which has not been recorded on Schedule B. Debt payments must be reflected on Schedule B as well as on Schedule D. Please amend your report to clarify this discrepancy. 2 U.S.C. §434(b)(5)(D)

-Schedule A of your report discloses a possible in-kind contribution of \$1,104.00 from the South Carolina Business & Industry Political Education Committee. Please be advised that in-kind contributions should properly be disclosed as a receipt on a Schedule A, as well as itemized on a Schedule B and added to the operating expenditures total on Line 21(b), in order to avoid inflating the cash-on-hand amount. 11CFR 104.13(a)(2) (See enclosed example)

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee

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registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). The Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Your calculations on Schedule D, for item B, appear to be incorrect. FEC calculations disclose the outstanding

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South Carolina Republican Party

balance at close of this period to be \$33,498.34.
Please clarify this discrepancy.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from Political Committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



J.P. Andre
Reports Analyst
Reports Analysis Division

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SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE OF FOR LINE NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full) SOUTH CAROLINA REPUBLICAN PARTY

Table with 4 columns: A. Full Name, Mailing Address and ZIP Code; Name of Employer; Date (month, day, year); Amount of Each Receipt this Period. Rows include: Flour Public Affairs Committee, Lonnie Rowell, SC Business-Industry Political Education Committee, American Printing, Rex F. Rice, S.F. Reid, Jr., and Donald Johnson.

SUBTOTAL of Receipts This Page (optional) 5604.00

TOTAL This Period (see page this line number only)

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